

INTO University Partnerships Limited (“INTO”)

Child Protection Policy

February 2023

Introduction

INTO and INTO Centres aim to adopt the highest possible standards and take all reasonable steps to safeguard children. Different types and signs of child harm/abuse are set out in Appendix 1.

INTO is fully committed to protecting children from harm and/or abuse in order to ensure that they are safeguarded whilst studying at an INTO Centre.

Legal framework

The following legislation is relevant to this policy:

- Health and Safety at Work Act 1974
- Rehabilitation of Offenders Act 1974
- Children Act 1989
- The Police Act 1997
- Protection of Children Act 1999
- Sexual Offences Act 2003
- The Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (as amended by Protection of Freedoms Act 2012)
- Equality Act 2010
- Education Act 2011
- The Counter-Terrorism and Security Act 2015
- Data Protection Act 2018

The Safeguarding Vulnerable Groups Act 2006 is of particular relevance to this policy as all decisions made to bar individuals from working with children or adults are made by the Disclosure and Barring Service (DBS) via this legislation.

Consideration has also been given to the Department for Education’s ["Keeping children safe in education"](#) guidance (updated 1 September 2022) for best practice purposes.

Policy Aim

INTO’s policy provides guidance on preventing and reducing harm to children when they are in contact with INTO staff, volunteers, contractors, or other students. It includes a more detailed analysis of what constitutes “safeguarding” at INTO.

In particular, the policy aims to:

- Promote and prioritise the safety and wellbeing of children (and adults at-risk);
- Assure parents, carers and other relevant stakeholders that INTO manages risks in relation to keeping children and adults at-risk safe;

- Ensure everyone understands their roles and responsibilities in respect of child protection and is provided with the necessary training, support and information;
- Ensure appropriate safeguards are in place to prevent the employment of individuals in work with children and/or adults at-risk where they have been barred by the DBS, or are deemed by INTO to pose a risk to vulnerable groups;
- Take action in the event of any allegations or suspicions regarding harm to children arising from contact with INTO staff, volunteers/contractors or students;
- Have in place whistleblowing procedures to allow for safeguarding concerns to be raised and effectively escalated; and
- Manage the risks associated with activities and/or events involving children and adults at-risk via completing risk assessments, implementing required actions identified by the risk assessment process and ensuring appropriate DBS checks are made.

This policy is used as the basis of each INTO Centre's approach to preventing and reducing harm to children. Implementation of this policy may differ slightly in order to take into account local operations and any child protection matters that are of particular relevance to a particular INTO Centre.

Scope of Policy

For the purposes of this policy, a "child" is defined as any person under the age of 18.

With due regard to statutory guidance, an "adult at-risk" is a person aged 18 or over who may be in need of care services by reason of mental or other disability, age or illness, and who is or may be unable to take care of themselves, or unable to protect themselves from harm or exploitation.

Roles and Responsibilities

Each INTO Centre will have a Designated Safeguarding Lead ("DSL"). Each DSL may delegate their activities to trained deputies, however ultimate lead responsibility for child protection will remain with the DSL.

In the event that the DSL or their deputy are unavailable, other INTO staff will be identified to ensure a continuous provision of child protection oversight.

The DSL (or their deputy) will always be available to discuss any immediate child protection concerns. The DSL will undergo regular training to provide them with the most up-to-date knowledge and skills required to carry out the role.

The DSL, and/or their deputy, is responsible for:

- Promoting the Child Protection Policy;
- Dealing with any reported suspicions and allegations of abuse of children or adults at-risk within the INTO Centre;
- Providing appropriate information when making a referral to external bodies (such as the DBS, the Police or local authorities); and
- Ensuring adequate records are kept in relation to the reporting of any child protection incidents.

In addition to the DSL, all staff, volunteers/contractors and students working with children and adults at-risk within an INTO Centre will be familiar with this policy and each INTO Centre shall ensure that all staff, volunteers/contractors and students working with children and adults at-risk complete mandatory training in the appropriate protection and safeguarding of children and adults at-risk.

Risk Assessment Process

The child protection risk assessment process will be initiated in the following circumstances (although other situations may trigger this procedure if deemed appropriate by the DSL):

- Recruitment to a new or existing role which involves working with children and/or adults at-risk;
- The commencement of new activities or events involving or potentially involving children and/or adults at-risk; and
- Changes being made to activities or events involving or potentially involving children and/or adults at-risk.

Where there are multiple activities or events of a similar nature, it may not be necessary to complete an individual risk assessment for each of them. Instead, it may be possible to complete an overarching risk assessment for a particular type of activity or event and ensure that the relevant risks are managed appropriately.

A risk assessment must be completed prior to the relevant activity or event by a competent person and retained accordingly. Where an activity is ongoing but unchanged, INTO Centres should review the risk assessment on an annual basis to ensure the measures in place are still appropriate.

Disclosure and Barring Service (DBS) Checks

INTO is entitled by law to apply for a standard or enhanced DBS check only where the activity is “regulated” or the activity in question falls within one of the other statutory exemptions permitting checks on spent convictions. Additionally, INTO’s policy requires all employees of an INTO centre to undergo an enhanced DBS check, considering the nature of its activities. Other employees or visitors to an INTO centre are bound by the local safeguarding policies of that centre in relation to DBS check requirements and access to the building etc.

Dealing with reported suspicions and allegations

Child protection concerns could arise in a variety of ways. For example, a child may report or show signs of abuse, someone may suggest that a child is at-risk or has been subject to harm, or someone may witness abuse.

Where a person suspects or is informed that a child or adult at-risk has been, is being, or could be harmed as a result of taking part in an INTO activity or event or through contact with INTO staff, volunteers or students, it is not the responsibility of that person to decide whether abuse has taken place. Instead, the individual should take the following steps:

1. Emergency situation

- a. This is where there is immediate and/or significant danger to a child/adult at-risk, or a criminal act has been witnessed
- b. Referrals must be made to the police, social services, or other appropriate authorities – this should be prior to consulting with the DSL or their deputy
- c. Where this is necessary, the DSL or their deputy should be informed immediately afterwards. In such cases a criminal investigation may follow.

2. Non-emergency situation

- a. Referrals should be made to the DSL or their deputy
- b. If none of the above can be contacted, a member of Centre SMT should be notified
- c. Where there are concerns about abuse, further advice and guidance can be sought from the NSPCC Helpline on 0808 800 5000, or via email to help@nspcc.org.uk. However, this should not take precedence over the process set out above.

Where a complaint of abuse is reported, the DSL or their deputy will carefully consider the information available and decide on the course of action. Such situations may require contact with the relevant external bodies, including the police. Consideration will also be given to whether it is necessary to notify the Centre Director and take further action through relevant internal procedures. This may include INTO's employee disciplinary procedures or, in the case of students, relevant student disciplinary procedures.

For all allegations raised, the following information should be recorded and retained in a secure and confidential manner:

- A clear and comprehensive summary of the allegation, including who made it and who it was made against;
- Details of how the allegation was followed up and resolved;
- Notes of any action(s) taken, decisions reached and the outcome as categorised above;
- A copy provided to the person concerned, where agreed by children's social care or the police (if applicable); and
- Whether the information will be referred to in any future reference.

As per statutory requirements, the record should be retained for 6 years after the end of the employment of the person the allegation was made against.

Data Protection

Having due regard to data protection requirements, only persons who **need** to be informed about an incident or concern, whether internal or external to INTO, should be informed. All information relating to child protection (risk assessments, training, records of concerns raised, event management documentation, photograph consent forms etc) should be handled in line with INTO's Data Protection Policy and retained in line with INTO's Data Retention Schedule.

Prevent

INTO recognises their duty to have due regard to the need to prevent children from being drawn into terrorism, and to support those who may be vulnerable to radicalisation.

All INTO employees receive Prevent training – upon induction and annually thereafter - and are expected to be vigilant, reporting any concerns to the DSL, who will follow the INTO procedure for raising concerns as per INTO's Safeguarding and Prevent policy.

Indicators that a child is at-risk could include the following:

- Glorification of violence
- Condoning or justifying killing
- Belief in conspiracy theories
- Use of extremist symbolism
- Closed to new views or discussions
- Dehumanisation of other groups of people

For the purposes of this policy, it is important to note that safeguarding children from radicalisation is no different from safeguarding them from other forms of harm.

Appendix 1 – Types and signs of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse a child by inflicting harm, or by failing to act to prevent harm. A child may be abused by an adult or adults or another child or children, and it is important to recognise that abusers can be any gender. As well as in person, abuse can take place wholly online and technology may also be used to facilitate abuse off-line.

This is a non-exhaustive list of abuse. Note that some forms of abuse can happen in an online environment as well as in person:

Neglect

Defined as persistent or severe neglect of a child, likely to result in significant impairment of the child's health or development. For example:

- Failure to provide adequate food, clothing or shelter
- Failure to protect from physical or emotional harm
- Failure to meet child's basic emotional needs
- Failure to ensure adequate supervision
- Failure to ensure access to appropriate medical care

Physical abuse

Defined as deliberate or intended injury to a child. For example:

- Hitting, shaking, throwing, burning, scalding, drowning, suffocating, or poisoning
- Deliberate inducement of an illness.

Sexual abuse

Defined as actual or likely sexual exploitation. For example:

- Use of force or enticement to take part in sexual activity - penetrative or non-penetrative
- Involvement in non-contact activities such as looking at or making abusive images
- Encouraging children to watch sexual activities
- Encouraging children to behave in sexually inappropriate ways
- Involving children in looking at, or in the production of, sexual images
- Grooming a child in preparation for abuse
- Any sexual activity with a child under the age of 16 (with or without their consent)

Emotional abuse

Defined as persistent or severe emotional ill treatment or rejection which adversely affects the child's emotional and behavioural development conveying to a child that they are worthless, unloved or inadequate. For example:

- Overprotection, limiting exploration and learning, preventing normal social interaction or imposing inappropriate expectations.
- Causing a child to feel frightened or in danger by the witnessing of violence towards another person whether domestic or not.

Online abuse

Defined as any type of abuse that happens on the internet. It can happen across any device that is connected to the web, and it can happen anywhere online including social media, messaging apps, text messages, emails, online chats, online gaming and live streaming sites. Examples include:

- Cyberbullying, which is any type of bullying that takes place online
- Online grooming, which is where someone builds a relationship online with a child so they can abuse, exploit or traffic them
- Sexting which is abusive if someone is coerced or pressured into sharing sexual, naked or semi-naked images of themselves or others or sending sexual messages.

Child on child abuse

This is the abuse of children by other children. It is most likely to include, but is not limited to:

- Bullying and / or cyberbullying
- Physical abuse (hitting, biting, kicking or otherwise causing physical harm)
- Sexual violence, sexual harassment, upskirting and sexting
- Initiation / hazing, violence and rituals
- Abuse in intimate personal relationships between children.

Female genital mutilation

This is all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons.

Child criminal exploitation

Children being forced or manipulated into committing crimes such as transporting drugs or money, shoplifting or violent crime.

Domestic Abuse

This abuse can happen as a one-off incident or over time. Children can be victims of domestic abuse, witness domestic abuse or experience it within their own intimate relationships. It can include:

- Psychological abuse
- Sexual Abuse
- Financial Abuse
- Physical Abuse
- Emotional Abuse

The signs of abuse

Being aware of the signs of abuse is the best way to help children. INTO staff should make themselves aware of the signs so they can identify children who may need support.

The list below is not exhaustive but outlines the common signs of abuse. Staff should realise that not all who are being abused exhibit external signs of this abuse, and sometimes children don't recognise that they are being abused or neglected.

Physical signs of abuse and neglect

Signs of abuse and neglect can include:

- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Respiratory problems from drowning, suffocation or poisoning
- Untreated or inadequately treated injuries
- Bruising which looks like hand or finger marks
- Cigarette burns, human bites
- Abdominal pain
- Headaches
- Scarring, scalds and burns
- Sexually transmitted infection/diseases
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections
- Difficulty walking or sitting
- Persistent sore throats
- Untreated health/dental issues
- Poor hygiene
- Poorly clothed, with inadequate protection from the weather
- Regularly left alone, or in the charge of siblings who are not old enough to look after them properly.

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- Behave aggressively or be disruptive, act out, demand attention and require more behavioural support than other children
- Become angry or disinterested and/or show little creativity
- Become sad, withdrawn or depressed
- Exhibit sleeping problems
- Exhibit inappropriate sexual knowledge for their age or sexualised drawings or behaviour in their play with other children
- Refuse to change their clothes for activities or participate in physical activities
- Develop eating disorders
- Self-harm
- Lack confidence or have low self-esteem
- Display a sudden change in behaviour – aggression, extroversion, depression, withdrawn
- Exhibit attention seeking behaviour, hyperactivity or a low attention span
- Appear frightened of parents or family members
- Display indiscriminate attachment
- Suffer from anxiety/irritability
- Have poor peer relationships
- Have frequent visits to the toilet (possible urinary infection)
- Spend more or less time online, texting, gaming or using social media
- Become more secretive about who they are talking to or what they are doing online.

Signs that a parent or other responsible adult may be abusing or neglecting a child

The parent/adult may:

- Offer conflicting or unconvincing explanations of any injuries to the child
- Appear indifferent to, or overtly rejects, the child

- Deny existence of or blames the child for the child's problems at home or on the programmes
- Display unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable
- See and describe the child as worthless, burdensome or in another negative light
- Refuse offers of help for the child's problems
- Be isolated physically/emotionally.

If a child is being groomed, there are indicators within an adult's behaviour that may become apparent. However, it is important to realise that not all adults who are grooming will show these signs, and not all adults who show these signs are grooming. It is unlikely that in the activities and programmes the INTO Centres run, that INTO staff will come across these signs, but they are highlighted for awareness.

- Overly affectionate behaviour with a child
- Affording special attention or preferential treatment to a child
- Excessive time spent with a child outside of the organisation
- Frequently spending time with a child in private or isolated areas
- Making friends with a child's parents and visiting their home
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.